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11                   UNITED STATES DISTRICT COURT  
12                   FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13                   SAN FRANCISCO DIVISION

14                   MASTEROBJECTS, INC.,

15                   Plaintiff,

16                   v.

17                   YAHOO!, INC.,

18                   Defendant.

Case No. C 11-2539 JSW

**STIPULATION FOR LEAVE TO FILE  
FIRST AMENDED COMPLAINT AND  
TO AMEND CASE MANAGEMENT  
SCHEDULE AND [PROPOSED]  
ORDER**

1 Plaintiff MasterObjects, Inc. (“Plaintiff”) and defendant Yahoo!, Inc. (“Defendant”),  
 2 hereby stipulate through their respective counsel of record as follows:

3 WHEREAS, on or about May 25, 2011, Plaintiff served its Original Complaint upon  
 4 Defendant; Plaintiff’s Complaint alleges counts for patent infringement, including direct  
 5 infringement, induced infringement, contributory infringement, and willful infringement;

6 WHEREAS, Defendant filed its Amended Answer and Counterclaims on or about  
 7 August 8, 2011, and Plaintiff filed its Answer to Amended Counterclaims on or about August  
 8 29, 2011.

9 WHEREAS, MasterObjects has subsequently had one additional patent issue, U.S.  
 10 Patent No. 8,060,639 (“System and Method for Utilizing Asynchronous Client Server  
 11 Communication Objects”);

12 WHEREAS, MasterObjects has received a Notice of Allowance for U.S. Patent  
 13 Application No. 09/933,493 (“System and Method for Asynchronous Client Server Session  
 14 Communication”) that a third patent will issue shortly;

15 WHEREAS, the parties agree that administrative and judicial efficiency will be  
 16 served if all the above MasterObjects patents, and claims arising thereunder, are asserted  
 17 together and on a consolidated schedule;

18 WHEREAS, Defendant and Plaintiff have agreed and stipulated to Plaintiff’s filing of  
 19 the First Amended Complaint, to add these subsequent patents to this case;

20 WHEREAS, the Initial Case Management Conference took place on September 30,  
 21 2011, and the Court at that time ordered a schedule for this case; and

22 WHEREAS, Plaintiff and Defendant have agreed to the following schedule, subject  
 23 to permitting the inclusion of the additional patents, and subject to this Court’s convenience:

	<b>Event</b>	<b>Current Dates</b>	<b>Proposed Dates</b>
1	Disclosure of Asserted Claims and Infringement Contentions and accompanying document production [Pat. L.R. 3.1-3.2]	11/7/11	12/28/11
2	Invalidity Contentions and accompanying document production [Pat. L.R. 3.3-3.4]	12/21/11	2/20/12
3	Exchange of Proposed Terms and Claim Elements for Construction [Pat. L.R. 4.1.a-b.]	1/4/12	3/5/12
4	Simultaneous Exchange of Preliminary Claim Constructions and Preliminary Identifications of Extrinsic Evidence [Pat. L.R. 4.2.a-b.]	1/25/12	3/26/12
5	Filing of Joint Claim Chart, Worksheet and Hearing Statement [Pat. L.R. 4.3]	2/21/12	4/20/12
6	Completion of Claim Construction Discovery [Pat. L.R. 4.4]	3/22/12	5/21/12
7	Opening Claim Construction Brief [Pat. L.R. 4.5.a.]	4/6/12	6/5/12
8	Responsive Claim Construction Brief [Pat. L.R. 4.5.b]	4/20/12	6/19/12
9	Reply Claim Construction Brief [Pat. L.R. 4.5.c]	4/27/12	6/26/12
10	Tutorial	(Approximately Two Weeks After Service of Reply Briefs, Subject to Court's Availability)	(Approximately Three Weeks After Service of Reply Briefs, Subject to Court's Availability)
11	Claim Construction Hearing [Pat. L.R. 4.6]	Subject to Court's availability	Subject to Court's availability
12			July 17, 2012 at 1:30 p.m.
13			July 24, 2012

22 WHEREFORE IT IS HEREBY STIPULATED BY THE PARTIES HERETO that

23 Plaintiff may have leave to file its First Amended Complaint, attached hereto as Exhibit 1,  
24 and that the case management dates set forth in Attached shall be ordered.

1 Dated: December 7, 2011

Respectfully submitted:

3 By: /s/ Spencer Hosie

4 Spencer Hosie  
5 Attorneys for Plaintiff  
MasterObjects, Inc.

6 By: /s/ Jennifer A. Kash

7 Jennifer A. Kash  
8 Attorneys for Defendant  
Yahoo!, Inc.

9 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic  
10 filing of this document has been obtained from the other signatories.

11 DATED: December 7, 2011

12 /s/ Spencer Hosie  
13 Spencer Hosie

1 PURSUANT TO STIPULATION IT IS ORDERED THAT  
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3 Leave to file Plaintiff's First Amended Complaint and to Amend Case Management  
4 Schedule is GRANTED.

5 Dated: December 9, 2011

  
6 Honorable Jeffrey S. White  
7 UNITED STATES DISTRICT JUDGE  
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